

Joshua Glucoft (SBN #301249)
KIRKLAND & ELLIS LLP
2049 Century Park East, Suite 3700
Los Angeles, CA 90067
Tel: (310) 552-4200
Fax: (310) 552-5900
josh.glucoft@kirkland.com

Counsel for Defendants,

Meta Platforms, Inc. and Meta Platforms Technologies, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

GENTEX CORPORATION and INDIGO
TECHNOLOGIES, LLC,

Plaintiffs,

THALES VISIONIX, INC.,

Involuntary Plaintiff,

v.

META PLATFORMS, INC. and META
PLATFORMS TECHNOLOGIES, LLC,

Defendants.

Case No. 4:22-cv-03892-YGR

**DECLARATION OF JOSHUA
GLUCOFT**

1 I, Joshua Glucoft, do hereby declare as follows:

2 1. I am an attorney licensed to practice law in the State of California and am a partner
3 with the law firm of Kirkland & Ellis LLP, located at 2049 Century Park East, Suite 3700, Los
4 Angeles, CA 90067. I am counsel for Defendants Meta Platforms, Inc. and Meta Platform
5 Technologies, LLC (collectively, “Defendants” or “Meta”) in the above-captioned action. I have
6 personal knowledge of the matters set forth below and if called and sworn as a witness, I could and
7 would testify competently to the facts set forth herein.

8 2. The following portions of Defendants’ Amended Answer disclose or reference
9 information that was designated as “Confidential,” “Proprietary,” or the like by Mr. Eric Foxlin’s
10 counsel:

- 11 • Page 21 – lines 24-25;
- 12 • Page 23 – lines 1-2, 11-17, 27-28;
- 13 • Page 25 – lines 9-10;
- 14 • Page 27 – lines 12-13, 15-18, 27-28;
- 15 • Page 28 – lines 1-2, 4-6, 14-15, 25;
- 16 • Page 29 – line 13;
- 17 • Page 30 – lines 18-19;
- 18 • Page 31 – line 19.

19 3. The following portions of the redline comparing Defendants’ Answer to Defendants’
20 Proposed Amended Answer disclose or reference information that was designated as “Confidential,”
21 “Proprietary,” or the like by Mr. Eric Foxlin’s counsel:

- 22 • Page 21 – lines 24-25;
- 23 • Page 23 – lines 1-2, 11-17, 27-28;
- 24 • Page 25 – lines 9-10;
- 25 • Page 27 – lines 12-13, 15-18, 27-28;
- 26 • Page 28 – lines 1-2, 4-6, 14-15, 25;
- 27 • Page 29 – line 13;
- 28 • Page 30 – lines 18-19;

- Page 31 – line 19.

4. Exhibits H, K, M, N, O, T, and U to Defendants’ Amended Answer have been designated confidential by Mr. Eric Foxlin’s counsel and are therefore being filed under seal in their entirety.

5. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 2nd day of March, 2023 in Los Angeles, California.

/s/ Joshua Glucoft

Joshua Glucoft

Counsel for Defendants,

*Meta Platforms, Inc. and Meta Platforms
Technologies, LLC*